



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND
WATERSHEDS

SEP 15 2016

Reply to
Attn of: OWW-191

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Aaron Scheff
Idaho Department of Environmental Quality
Regional Administrator, Boise Office
1445 N. Orchard St.
Boise, ID 83706

Re: Request for Final Certification under Clean Water Act (CWA) Section 401 for City of Parma
Wastewater Treatment Plant, Permit No. ID0021776

Dear Mr. Scheff:

Enclosed for your use in completing final Clean Water Act Section 401 certification is a copy of the proposed final National Pollutant Discharge Elimination System (NPDES) permit which the U.S. Environmental Protection Agency proposes to reissue to the above referenced facility. As a result of comments received during the public comment period, the following revisions were made to the permit:

- Revised location coordinates (latitude and longitude) for the outfall
- Table 4 Task 3 – Evaluate and Obtain Financing. The completion date for an interim step in the phosphorus compliance schedule was revised to be 5 years from the effective date of the permit. Note that the date for the completion of this task was inconsistent in IDEQ's draft 401 certification. Refer to columns 2 and 3 of Task No. 3 in the draft certification. In column 2 the completion date is required five years from the effective date of the permit. In column 3, the completion date for the same task is four years from the effective date of the permit. Please correct this inconsistency in the final certification.

In addition to revisions resulting from comments received, EPA revised the proposed final permit to require the use of NetDMR with the effective date of the permit. The draft permit allowed the facility the option to submit a paper DMR until submittal of the November 2016 DMR results. That transition period will have passed once the permit is effective.

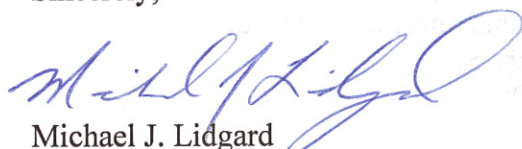
We request that your certification follow the federal regulations governing state certification at 40 CFR §124.53(e). The regulations allow for the State to stipulate more stringent conditions in the permit, if the certification cites the Clean Water Act or State law references upon which that condition is based. In addition, the regulations require the certification to include statements for each condition of the permit that can be made less stringent without violating the requirements of State law.

In addition to the general requirements for State certification in 40 CFR 124.53, the EPA requests that IDEQ address the following in its Section 401 certification: compliance schedules for total residual chlorine and total phosphorus and a mixing zone of 25% for chlorine and ammonia.

Final action on the permit cannot be taken until your agency has granted or denied certification under 40 CFR §124.55, or waived its right to certify. Pursuant to 40 CFR §124.53(c)(3), the State will be deemed to have waived its right to certify unless that right is exercised within 30 days of the receipt of the proposed final permit.

If you have any questions on the permit, please contact Susan Poulsom at (206) 553-6258 or poulsom.susan@epa.gov.

Sincerely,



Michael J. Lidgard
Manager, NPDES Permits Unit

Enclosure

cc: Kati Carberry, IDEQ Boise (via email Kati.Carberry@deq.idaho.gov)
Lance Holloway, IDEQ Boise (via email Lance.Holloway@deq.idaho.gov)
Nicole.Deinarowicz, IDEQ HQ office (via email Nicole.Deinarowicz@deq.idaho.gov)